

**SMPC HOLDING RESPONSE TO
PLANNING APPLICATION UDC/18/O460/FUL
FROM STANSTED AIRPORT LTD (“STAL”)**

Stansted Mountfitchet Parish Council is lodging some initial comments on planning application UDC/18/O460/FUL. A fuller response will be sent before the revised closing date of 30 April 2018.

- **Nationally Significant Infrastructure Project**

This project is too significant for the application to be assessed and determined at local level. We ask that it be immediately referred to the Secretary of State for national determination.

- **Prematurity**

For the past two decades STAL has been “stockpiling” caps for numbers of passengers and flights and has adequate capacity for at least the next 5 years. Existing caps, which were approved 10 years ago, were clearly in excess of what was needed at that time and as a result still have plenty of headroom. There is no justification for further increasing capacity ahead of a new national aviation policy and the impacts of Brexit.

- **Methodology For Environmental Impact Assessment**

SMPC comments on the Scoping Report made it clear that the proposed methodology for the Environmental Impact Assessment (“EIA”) was unacceptable. These comments have been ignored and therefore the EIA attached to this planning application is considered not fit for purpose. Specifically, the EIA understates the adverse impacts across a range of topics by only considering the difference between the “Do Minimum” scenario (based on out of date assessments made 12 years ago of impacts still 6 years in the future in 2023) and the “Development Case”.

- **Road / Rail Infrastructure**

Congestion on both roads and rail is well documented and already unacceptably high. When central government originally approved the expansion of Stansted Airport in 1985 it was staggered over two phases in recognition of local concerns and *“to control the rate of development at Stansted so that it did not outpace the ability of*

local road and rail links and housing to cope with it, and to assure residents that a balance would be struck between aviation and local interests” (quotation from Hansard). Improvements to local road and rail links must **precede** any further permission for expansion of the airport’s capacity, otherwise any balance between aviation and the interests of local residents will be compromised.

- **Air Noise**

The methodology used for assessing the impact of additional noise is inadequate. Furthermore, the principal metric used to measure noise has significant deficiencies as acknowledged by central government but which are deliberately ignored by STAL’s acoustic experts. LAeq 16h is based on a 36 year old noise attitude survey and has been in use for the past three decades. The most recent survey of noise attitudes (SONA 14) acknowledges the following defects in this metric:

- a) It is difficult to comprehend, being on a logarithmic scale,
- b) An equivalent continuous level is not consistent with people’s perception of aircraft noise as a number of discrete, noticeable events, and
- c) It is out of date, 57 dB LAeq 16h no longer represents the approximate onset of significant community annoyance.

These deficiencies have been airbrushed out of the EIA.

- **Air Quality**

It is noted from the EIA that high levels of pollutant concentrations in excess of relevant air quality standards are already being recorded at a monitoring site near Burton End which is adjacent to Forest Hall School. This represents a serious health issue which can only be exacerbated if this application is approved.

- **Housing**

Uttlesford has struggled for years to identify suitable sites to meet existing housing needs before any further expansion of the airport is taken into account. New housing developments both in Uttlesford and in neighbouring East Herts have proved to be highly contentious because of the additional pressures they place on already over-stretched infrastructure. The concern of local residents is that the largely rural environment, which is one of the main attractions of living in this area, is being eroded by the creeping urbanisation associated with the expansion of the airport. This issue, ignored in the EIA, provides another illustration of the unbalanced approach which underpins it.

- **Socio Economic Effects**

According to the planning application, under the heading of socio-economic effects the EIA “has not identified any significant effects requiring mitigation”. As stated previously in the SMPC comments on the Scoping Report, this section of the EIA should be more correctly entitled “Socio Economic Benefits” because the assessment is completely unbalanced and considers none of the economic downside associated with the proposed development. For example, there is no mention of the net tourism deficit or of the impact on the residential property market, where many millions of pounds has been sucked out of the local economy. This section of the EIA is so one-sided that it lacks any credibility.

- **Land Compensation**

In 3,000 pages of this planning application there is not a single reference to this important topic. STAL has evidently decided to draw a veil over the subject in this planning application in the hope of concealing the fact that it has not met its legal obligations under the Land Compensation Act in respect of previous planning permissions dating back to 1999. This is important because the infrastructure works which are the subject of this application would, if permitted, give rise to future compensation claims. STAL no doubt hopes to avoid such future claims as it has done in the past. In this respect it shows little regard for the law of the land.

- **Timetable For Responses**

The time allowed for assessing and responding to a 3,000 page planning application is unrealistic. It would be of interest to learn how long it took STAL to assemble the application and the scale and expertise of the team involved in that process. It is also worth noting that the application was submitted within two months of the Scoping Opinion from UDC suggesting that most of the application was written beforehand.